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MEMO ENDORSED

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September 29, 2022

**BY ECF**

The Honorable Kenneth M. Karas  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *United States v. Darren Lindsay, et al. (Indigo Grant)*, 21-cr-441 (KMK)

Dear Judge Karas:

I write on behalf of our client, Indigo Grant, to respectfully request that the Court modify the conditions of release imposed in this case on July 14, 2021, specifically the travel and curfew conditions. At the initial presentment, Magistrate Judge McCarthy ordered Ms. Grant's release on a \$200,000 secured personal appearance bond to be signed by Ms. Grant and two financially responsible adults. Judge McCarthy imposed additional conditions of pretrial supervision, which included a travel restriction (limiting Ms. Grant to the Southern and Eastern Districts of New York, the Northern District of Georgia, and points in-between for purposes of court appearance and attorney visits only), curfew and GPS monitoring. Ms. Grant currently resides in the Atlanta metropolitan area and is supervised there by United States Pretrial Services Officer Krystal J. Batchelor. Pretrial Services Officer Leo Barrios oversees Ms. Grant's case out of the Pretrial Services Office in White Plains, New York. Mr. Barrios confirmed that Ms. Grant is compliant with all conditions of release at this time.

Ms. Grant seeks temporary modification of the travel and curfew conditions so that she may travel to Chicago, Illinois, for work-related matters. Ms. Grant is the owner of Indigo Grant Management ("IGM"), a talent agency that she established and owns, and through which Ms. Grant provides marketing, public relations, and social media services to the music industry. One of Ms. Grant and IGM's clients, who is a professional basketball player, has a scheduled press conference on October 4, 2022, prior to the start of the NBA season. The press conference will take place in Chicago and is intended to promote the athlete's brand. Ms. Grant and IGM have been working with this client with regard to his branding and specifically to prepare him for the upcoming press conference. Accordingly, he has asked for her to be present to assist him in-person in Chicago. If approved, Ms. Grant plans to fly into the Chicago area on October 3, 2022, and will return to Atlanta on October 5, 2022. Ms. Grant's presence is critical as she is the primary representative for and liaison between her client and third parties, which includes the media. Ms. Grant has been preparing her client for media appearances, including press

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conferences that she personally scheduled for him, to promote his brand. Ms. Grant's client wants her present so that she can guide him in real time regarding responses to questions posed.

Ms. Grant seeks permission to travel to Miami on October 18, 2022, to assist the same IGM client at another press conference, which is scheduled for October 19, 2022. She will return to Atlanta on October 20, 2022.

Prior to leaving the Northern District of Georgia for each trip, Ms. Grant will provide Pretrial Services with an itinerary identifying her travel details, the address where she will be staying, and her work-related schedule.

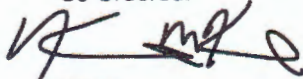
I contacted Mr. Barrios about the instant modification request. Mr. Barrios informed me that his office has no objection to the travel requests.

I also conferred with Assistant United States Attorney Nicholas Bradley about the instant modification request. Mr. Bradley informed me that the government objects to the travel requests citing to an August 17, 2022, email wherein the government informed defense counsel that, "in the future, the Government will oppose your client's requests to attend music festivals like the below unless you can provide far more detailed information as to why her physical presence is necessary. Your client runs a self-described multi-million dollar business and has had plenty of time to make arrangements for staff members to cover the tasks you describe below such as attending to 'food needs' and 'captur[ing] . . . footage.' To the extent your client serves as a point of contact, that can be done over the phone or telework." As is apparent from the instant request, Ms. Grant is not seeking to attend a music festival. And, at this time, Ms. Grant is the Chief Operating Officer and *lone employee* of her company. She cannot send anybody else. Moreover, the nature of the work is not necessarily delegable. Ms. Grant's background and experience as an agent is the reason why her client wants *her* present at a press conference.

Thank you for your consideration of this matter.

Application is granted. Ms. Grant is to provide Pre-trial services with a full itinerary before she departs.

So Ordered.



9/30/22

Respectfully submitted,

/S/JIS

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cc: Counsel of record (via ECF)  
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